

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND  
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.<sup>1</sup>

PROMESA  
Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**This filing relates to the  
Commonwealth and PBA.**

**REPLY OF THE COMMONWEALTH OF PUERTO RICO AND THE PUERTO RICO  
PUBLIC BUILDINGS AUTHORITY TO RESPONSE FILED BY CLAIMANT GENESIS  
SECURITY SERVICES, INC. [ECF NO. 17408] TO THREE HUNDRED THIRTY-  
FIFTH OMNIBUS OBJECTION (NON-SUBSTANTIVE) TO DUPLICATE CLAIMS**

To the Honorable United States District Judge Laura Taylor Swain:

The Commonwealth of Puerto Rico (the “Commonwealth”) and the Puerto Rico Public Buildings Authority (“PBA,” and together with the Commonwealth, the “Debtors”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as the sole Title III representative of the Commonwealth and PBA pursuant to section 315(b) of

<sup>1</sup> The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

the *Puerto Rico Oversight, Management, and Economic Stability Act* (“PROMESA”),<sup>2</sup> files this reply (the “Reply”) to the *Genesis Security Services, Inc. Response to Three Hundred Thirty-Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Puerto Rico Buildings Authority to Duplicate Claims*<sup>3</sup> [ECF No. 17408] (the “Genesis Security Services Response”) and in support of the *Three Hundred Thirty-Fifth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Puerto Rico Public Buildings Authority to Duplicate Claims* [ECF No. 17104] (the “Three Hundred Thirty-Fifth Omnibus Objection”). In support of this Reply, the Debtors respectfully represent as follows:

1. On June 18, 2021, the Debtors filed the Three Hundred Thirty-Fifth Omnibus Objection seeking to disallow proofs of claim that are duplicative of other proofs of claim filed against the Debtors (collectively, the “Duplicate Claims”), each as listed on Exhibit A thereto.
2. Any party who disputed the Three Hundred Thirty-Fifth Omnibus Objection was required to file a response by 4:00 p.m. (Atlantic Standard Time) on July 19, 2021, in accordance with the Court-approved notice attached to the Three Hundred Thirty-Fifth Omnibus Objection as Exhibit C, which was served in English and Spanish on the individual creditors subject to the Three Hundred Fortieth Omnibus Objection, the U.S. Trustee, and the Master Service List (as defined in the *Fourteenth Amended Case Management Order* [ECF No. 15894-1]).

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<sup>2</sup> PROMESA is codified at 48 U.S.C. §§ 2101-2241.

<sup>3</sup> Although the Genesis Security Services Response purports to address solely the Three Hundred Thirty-Fifth Omnibus Objection, it addresses claims subject to both the Three Hundred Thirty-Fifth Omnibus Objection and the *Three Hundred Fortieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority to Duplicate Claims* [ECF No. 17087] (the “Three Hundred Fortieth Omnibus Objection”).

3. Genesis Security Services filed a claim against PBA on July 28, 2020, and it was logged by Prime Clerk, LLC as Proof of Claim No. 174317 (the “First Genesis Security Services Claim”). On July 29, 2020, Genesis Security Services filed two additional claims against PBA; one was logged by Prime Clerk, LLC as Proof of Claim No. 174424 (the “Second Genesis Security Services Claim”), and the other was logged by Prime Clerk, LLC as Proof of Claim No. 174436 (the “Third Genesis Security Services Claim,” and together with the First Genesis Security Services Claim and the Second Genesis Security Services Claim, the “Genesis Security Services Claims”). Each of the Genesis Security Services Claims asserts liabilities in the amount of \$483,760.98. Only the Second Genesis Security Services Claim is subject to the Three Hundred Thirty-Fifth Omnibus Objection.<sup>4</sup>

4. The Genesis Security Services Response does not dispute that the First Genesis Security Services Claim and the Second Genesis Security Services Claim are duplicative of the Third Genesis Security Services Claim. Indeed, Genesis Security Services “confirm[s] that in fact, its collection of money claim in the amount of \$483,760.95 was provided with three (3) different identification numbers; that is, Claim No. 174436, Claim No. 174424, and Claim No. 174317.” Genesis Security Services Response at 2. Accordingly, Genesis Security Services states that it “raises no objection to the removal of” the First Genesis Security Services Claim and the Second Genesis Security Services Claim, but “reserves the right to oppose any future objections” to the Third Genesis Security Services Claim. *Id.*

5. Because Genesis Security Services does not dispute that the Second Genesis Security Services Claim is duplicative of the Third Genesis Security Services Claim, the Debtors

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<sup>4</sup> The First Genesis Security Services Claim is subject to the Three Hundred Fortieth Omnibus Objection. The Debtors’ response to the Genesis Security Services Response, as it relates to the Three Hundred Fortieth Omnibus Objection, is being submitted contemporaneously herewith.

respectfully request that the Court grant the Three Hundred Thirty-Fifth Omnibus Objection and disallow the Second Genesis Security Services Claim in its entirety, notwithstanding the Response.

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Dated: July 28, 2021  
San Juan, Puerto Rico

Respectfully submitted,

/s/ Hermann D. Bauer

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